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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (425) 649-7000

March 23, 2000

CERTIFIED MAIL
7099 3220 0000 1120 6497

Russ Simonson
Lafarge Corp.
5400 W Marginal Wy
Seattle, WA 98106

Dear Mr. Simonson:

RE: Dangerous Waste Compliance Inspection at Lafarge Corp.
RCRA ID# WAD 041580176 on 2/28/00

Thank you for your time during the recent compliance inspection. The purpose of this inspection was to determine compliance with the Washington State Dangerous Waste Regulations (Chapter 173-303 WAC). These regulations establish a system for safe and responsible management of dangerous waste. Based on my visit to your facility, it appears that most dangerous waste compliance issues have been well addressed.

As we discussed after the inspection, there were a few areas of non-compliance with the Dangerous Waste Regulations at Lafarge Corp.. The conditions not in compliance are listed in the enclosed Compliance Report. Please complete the actions needed to achieve compliance as listed in the Compliance Report within the specified timeframes. Please be aware that any uncorrected violations are subject to enforcement action by Ecology, including the issuance of an administrative order and/or penalty under the Hazardous Waste Management Act (RCW 70.105.080 and .095).

Many miscellaneous containers of unused or off spec material are being stored in the laboratory. Some containers had inventory dates indicating they had been on-site since 1995. Lafarge may anticipate future opportunity for recycling or reuse of these materials. All material in this area should be inventoried and identified to separate any incompatible chemicals. A recyclable material is not considered accumulated speculatively if there is a feasible means of being recycled and 75% of the material is recycled within the calendar year (commencing January 1). Refer also to WAC 173-303-016(5)(ii): Hazardous waste may not be accumulated speculatively in anticipation of recycling.

Please complete and submit the reply portion of the Compliance Report, along with any requested documentation, to *Bob Stone* at *Department of Ecology, 3190 160th Ave SE, Bellevue, WA 98008* by ***April 14, 2000)*** so that our records properly reflect your compliance status. Please do not hesitate to call me at 425.649.7216 should you have questions or require clarification of any items in the Compliance Report.

Sincerely,

Robert A Stone
Hazardous Waste Specialist

cc: Dave Misko, HWTR-NWRO
RCRIS
HZ 3.1

Enclosure

Washington Department of Ecology
Hazardous Waste & Toxics Reduction Program
Compliance Report

Site:	**Lafarge Corp.**	**ID#:**	**WAD 041580176**
Inspection Date:	2/28/00		
Site Contacts:	Russ Simonson		
Phone:	(206) 937-8025	FAX	
Site Location:	5400 W Marginal Wy Seattle, WA 98106		
At This Site Since:		SIC#	3241
Generator/Site Status:	**LQG,** MQG, SQG, Transporter, Transfer, TSD, other		

Ecology

Lead Contact:	Bob Stone	Phone: (425) 649-7216 rsto461@ecy.wa.gov	FAX: (425) 649-7098
Other Representatives:	Lisa Perle		
Report Date:	3/9/00		
Report By:	Bob Stone	Robert J. Stone (Signed)	3/9/00 (Date)

Facility Background:

The Lafarge cement plant uses a wet process to manufacture Portland cement. A slurry containing raw materials such as limestone, clay silica, and iron are mixed with water and pumped into the kiln. The slurry is heated (approx. 2700deg. F.) in the kiln and chemically bound to form a product that is ground into a fine powder as cement. Lafarge (previously Holnam) has been involved in the use of alternative raw materials and fuels. Examples include: spent sandblast grit, PCS, pulp mill lime slurry, used oil, and shredded tires.

The cement kiln generates approximately 45,000 tons per year of cement kiln dust (CKD) that they are unable to incorporate back into the cement manufacturing process. CKD designates as "special waste for the Washington State characteristic of solid corrosivity (WSC2). Lafarge has submitted documentation to demonstrate the potential markets for legitimate CKD recycling for the following applications:

1. Agricultural Fertilizer registered with the Department of Agriculture,
2. Waste Stabilization and Neutralization,
3. Landfill Cover,
4. Construction Activities and Stabilization, and
5. Miscellaneous Product Manufacturing.

The plant had just resumed operation of the kiln following a six-week shut down for annual maintenance. Mr. Simonsen explained that the shut down also provided an opportunity for engineering and design changes to the kiln that they anticipate will result in significantly reduced production of CKD. The maintenance and construction activities are being done by outside contractors working on-site.

Other routine wastes that are generated at the plant result from maintenance activities such as: parts washing, cleaning and minor painting.

The purpose of this inspection was to document compliance with Chapter 173-303 WAC, the Dangerous Waste Regulations.

Inspection Summary:

The following areas of concern and non-compliance were identified during the tour of the facility:

The waste solvent container located in the hazardous waste accumulation area had an open funnel in the bung and was not securely closed.

A pallet with misc. one and five gallon containers (approx. 30 x one gallon and 25 x five gallon) of waste paint and solvent was located outside the hazardous waste accumulation area. Some containers were open and/or leaking their contents on the pallet. There was no provision for secondary containment for the contents of these containers.

A wheelbarrow near the hazardous waste accumulation contained approx. 20 aerosol cans of paints, lubricants, or adhesives.

Many miscellaneous containers were located in various areas were contractor maintenance activities were taking place. Many containers were open and unlabeled with unknown contents. There was no provision for secondary containment for the contents of these containers.

A chemical storeroom is located next to the on-site analytical laboratory. There were containers of off-spec, expired, or excess chemicals that have collected over 4 or 5 years. These chemical reagents include corrosive acid and base, oxidizers, and flammable solvents.

Hazardous waste records and shipping manifests for 1998 and 1999 were reviewed. The return to generator copy for hazardous waste manifest #30838 (3/10/98) and all manifests for 1999 were not available.

Suggestions:

Pollution Prevention is the use of materials, processes, or practices that reduce or eliminate the creation of pollutants or wastes at the source. It includes practices that reduce the use of hazardous and non-hazardous materials, energy, water, or other resources as well as those that protect natural resources through conservation or more efficient use. Many of the housekeeping problems that were noted in this inspection may have been avoided through employee and contractor training in hazardous waste management and tracking procedures.

Chemicals comprise a major source of hazardous substances wasted. Misuse, spills, inefficient handling and improper uses result in significant pollution streams. Tracking chemical use includes purchasing, inventory, use, and waste generation. This tracking system may also include waste composition analysis. Significant changes in tracked data will detect the location and cause of problems. Proper transportation, storage and handling are necessary to avoid losses.

For more information or assistance call Dennis Johnson at 425/649-7040